

Solares v. Diaz,
United States District Court, Eastern District of California
Case No. 1:20-CV-00323-JLT-BAM

**CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION'S (CDCR)
IN RESPONSE TO PLAINTIFF'S SUBPOENA TO THE OFFICE OF THE INSPECTOR GENERAL
June 6, 2025**

Entry Number	Document Description	Date of Document(s)	Identity and Position of Author	Identity and Position of Recipients	Present Location of Document	Privilege Claimed	Number of Pages	Privilege Claimed as to Entire Document?
1	Memorandum regarding potential staff misconduct proceeding	2/25/20	Thomas Morgan, attorney for CDCR	Warden K. Clark	California Department of Corrections and Rehabilitation	Attorney-Client privilege, attorney work product	4	Yes
2	Memorandum regarding potential staff misconduct proceeding	2/25/20	Thomas Morgan, attorney for CDCR	Warden K. Clark	California Department of Corrections and Rehabilitation	Attorney-Client privilege, attorney work product	4	Yes
3	Memorandum regarding potential staff misconduct proceeding	1/24/20	Thomas Morgan, attorney for CDCR	Warden K. Clark	California Department of Corrections and Rehabilitation	Attorney-Client privilege, attorney work product	3	Yes

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4	Attorney's Initial Evaluation	3/30/19	Thomas Morgan, attorney for CDCR	Warden K. Clark Gene Petit, Claudia Graves, CDCR Office of Internal Affairs Emilia Orosco, CDCR Employment Resources Officer	California Department of Corrections and Rehabilitation	Attorney-Client privilege, attorney work product	5	Yes
5	Memorandum regarding potential staff misconduct proceeding	1/24/20	Thomas Morgan, attorney for CDCR	Warden K. Clark	California Department of Corrections and Rehabilitation	Attorney-Client privilege, attorney work product	3	Yes
6	Memorandum – Investigative Report Review	10/11/2019	Thomas Morgan, attorney for CDCR	Mark Miller, Kurtis Aaronsen, John McFayden, CDCR Office of Internal Affairs	California Department of Corrections and Rehabilitation	Attorney-Client privilege, attorney work product	2	Yes
7	Memorandum – Possible Misconduct by Staff	11/25/2019	Kurtis Aaronsen, CDCR Office of Internal Affairs	Warden K. Clark Thomas Morgan, attorney for CDCR Wendy Avila, Office of the Inspector General	California Department of Corrections and Rehabilitation	Attorney-Client privilege, psychotherapist-patient privilege	3	Yes as to attorney-client privilege. No as to psychotherapist-patient privilege.

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8	Memorandum regarding potential staff misconduct proceeding	1/24/20	Thomas Morgan, attorney for CDCR	Warden K. Clark	California Department of Corrections and Rehabilitation	Attorney-Client privilege, attorney work product	3	Yes
9	Memorandum – File review	1/22/20	Warden Kelly Santoro, North Kern State Prison	Warden K. Clark	California Department of Corrections and Rehabilitation	Psychotherapist-patient privilege	4	No, CDCR will produce a redacted copy.
10	Memorandum – File review (copy of entry no. 9)	1/22/20	Warden Kelly Santoro, North Kern State Prison	Warden K. Clark	California Department of Corrections and Rehabilitation	Psychotherapist-patient privilege	4	No, CDCR will produce a redacted copy.
11	Notes regarding potential staff misconduct proceeding	4/29/2009	Warden S. Sherman, Substance Abuse Treatment Facility	Warden K. Clark	California Department of Corrections and Rehabilitation	Psychotherapist-patient privilege	2	No, CDCR will produce a redacted copy

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12	Letter regarding potential staff misconduct proceeding, including discussion of communications from attorney Thomas Morgan	October or November, 2019	M. Miller, Office of Internal Affairs	W. Avila, Office of the Inspector General	California Department of Corrections and Rehabilitation	Attorney-Client privilege, attorney work product, psychotherapist-patient privilege	3	No, CDCR will produce a redacted copy
13	Memorandum regarding potential staff misconduct proceeding	1/24/20	Thomas Morgan, attorney for CDCR	Warden K. Clark	California Department of Corrections and Rehabilitation	Attorney-Client privilege, attorney work product	3	Yes
14	Memorandum regarding potential staff misconduct proceeding	1/22/20	Thomas Morgan, attorney for CDCR	Warden K. Clark	California Department of Corrections and Rehabilitation	Attorney-Client privilege, attorney work product	3	Yes

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15	Memorandum regarding potential staff misconduct proceeding including discussion of communications from attorney Thomas Morgan	2/10/2020	Warden K. Clark	T. Ramos, Chief, Office of Internal Affairs	California Department of Corrections and Rehabilitation	Attorney-Client privilege, attorney work product	2	No, CDCR will produce a redacted copy
16	Letter regarding potential staff misconduct proceeding	October or November, 2019	M. Miller	Thomas Morgan, attorney for CDCR	California Department of Corrections and Rehabilitation	Attorney-Client privilege, attorney work product	3	Yes
17	Memorandum regarding potential staff misconduct proceeding	1/27/20	S. Sherman, warden, Substance Abuse Treatment Facility	J. Lozano, Associate Director, Division of Adult Institutions	California Department of Corrections and Rehabilitation	Psychotherapist-patient privilege	2	No, CDCR will produce a redacted copy
18	Memorandum regarding potential staff misconduct proceeding	1/24/20	Thomas Morgan, attorney for CDCR	Warden K. Clark	California Department of Corrections and Rehabilitation	Attorney-Client privilege, attorney work product	3	Yes

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19	Memorandum regarding potential staff misconduct proceeding	1/24/20	Thomas Morgan, attorney for CDCR	Warden K. Clark	California Department of Corrections and Rehabilitation	Attorney-Client privilege, attorney work product	4	Yes
20	Hiring Authority Review of Investigation including work product from attorney Thomas Morgan	3/2/20	Acting Chief Deputy Warden, Corcoran State Prison	CDCR confidential file for potential staff misconduct proceeding	California Department of Corrections and Rehabilitation	Attorney work product	42	No, CDCR will produce a redacted copy
21	Hiring Authority Review of Investigation including work product from attorney Thomas Morgan	2/26/20	Acting Chief Deputy Warden, California State Prison, Corcoran	CDCR confidential file for potential staff misconduct proceeding	California Department of Corrections and Rehabilitation	Attorney work product	4	No, CDCR will produce a redacted copy

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22	Hiring Authority Review of Investigation including work product from attorney Thomas Morgan	2/26/20	Acting Chief Deputy Warden, California State Prison, Corcoran	CDCR confidential file for potential staff misconduct proceeding	California Department of Corrections and Rehabilitation	Attorney work product	3	No, CDCR will produce a redacted copy
23	Hiring Authority Review of Investigation including work product from attorney Thomas Morgan	2/26/20	Acting Chief Deputy Warden, California State Prison, Corcoran	CDCR confidential file for potential staff misconduct proceeding	California Department of Corrections and Rehabilitation	Attorney work product	4	No, CDCR will produce a redacted copy
24	Memorandum	1/21/2020	Consulting expert retained by attorney Thomas Morgan	Attorney Thomas Morgan's file for potential staff misconduct proceeding	California Department of Corrections and Rehabilitation	Attorney work product	4	Yes

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25	Curriculum Vitae	1/2020	Consulting expert retained by attorney Thomas Morgan	Attorney Thomas Morgan's file for potential staff misconduct proceeding	California Department of Corrections and Rehabilitation	Attorney work product	5	Yes